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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ACQUISITION DOCUMENTS**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its May 30 opposition and supporting exhibits to Defendants’ Administrative Motion to File Under Seal Acquisition Documents (the “Opposition”), filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Highlighted in Blue	Defendants
Exhibits to the Nardinelli Declaration in Support of Opposition	Entire Documents	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. UBER’S CONFIDENTIAL INFORMATION

Waymo seeks to seal the portions of the Opposition and supporting exhibits only because Defendants have designated the information confidential (*see* Dkt. 515). Declaration of Lindsay Cooper (“Cooper Decl.”) ¶ 3. Waymo partially opposes the merits of sealing Defendants’ designated material, as detailed in the Opposition, and expects Defendants to file one or more declarations in accordance with the Local Rules.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

DATED: May 30, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
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